

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF FLORIDA**

**Case No. 9:24-cv-80777-AMC**

**CHARLES ROTSZTAJN,**

Plaintiff,

v.

**CBW BANK and PRIME RECOVERY LLC,**

Defendants.

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**PLAINTIFF'S SUPPLEMENT ON SERVICE**

Plaintiff Charles Rotsztajn ("Plaintiff") submits this Supplement on Service pursuant to this Court's Paperless Order [Doc. 15] and states:

1. Plaintiff's process server effectuated service on Defendant Prime Recovery LLC by serving Jessica Pena. *See Doc. 8* (the docketed Return of Service for Defendant Prime Recovery LLC). Although Defendant Prime Recovery LLC was served in accordance with Fla. Stat. 48.031(6)(a) and the Return of Service otherwise signed under penalty of perjury, *see Doc. 8*, being mindful of the policy disfavoring defaults, Plaintiff shall reserve the above-captioned matter by and through the named registered agent of Defendant Prime Recovery LLC.

2. Pursuant to public records, the registered agent of Defendant Prime Recovery LLC is Anthony Lagambina.

3. Plaintiff has directed his process server to reserve the above-captioned matter on Defendant Prime Recovery LLC by and through its registered agent, Anthony Lagambina. Plaintiff expects to have service effectuated on Defendant Prime Recovery LLC by and through Anthony Lagambina within the next three (3) weeks.

4. In light of the above, and for clarity of record, Plaintiff shall separately file a Notice of Striking regarding the return of service [Doc. 8] docketed for Defendant Prime Recovery LLC.

*See Doc. 8.*

DATED: August 20, 2024

Respectfully Submitted,

/s/ Thomas Patti

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**CERTIFICATE OF SERVICE**

The undersigned hereby certifies that on August 20, 2024, the foregoing was electronically filed with the Clerk of the Court using the CM/ECF system which will send a notice of electronic filing to all counsel of record.

/s/ Thomas J. Patti

**THOMAS J. PATTI, ESQ.**

Florida Bar No.: 118377